

To: 'Middleton, Alan'[AlanMiddleton@DWT.COM]
Cc: Leighann Denton[Leighann.Denton@ci.bremerton.wa.us]; Thelma Swem[Thelma.Swem@ci.bremerton.wa.us]
From: Mark Koontz
Sent: Wed 4/15/2009 3:24:46 AM
Subject: RE: Sesko

Thank you.

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Middleton, Alan [mailto:AlanMiddleton@DWT.COM]
Sent: Wednesday, April 15, 2009 10:24 AM
To: Mark Koontz
Cc: Leighann Denton; Thelma Swem
Subject: RE: Sesko

I don't yet; I've tried to refocus Natacha on it as something she needs to do ASAP.

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Wednesday, April 15, 2009 10:23 AM
To: Middleton, Alan
Cc: Leighann Denton; Thelma Swem
Subject: RE: Sesko

Thank you. I will agree to continue the depositions to May 15. Do you have copies of the photos and videos that you can send to me?

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Middleton, Alan [mailto:AlanMiddleton@DWT.COM]
Sent: Wednesday, April 15, 2009 10:21 AM
To: Mark Koontz
Cc: Leighann Denton; Thelma Swem
Subject: RE: Sesko

I just spoke to her; she is traveling (b) (6) so her availability is limited, but of the dates you offered she can do May 15.

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Wednesday, April 15, 2009 10:16 AM
To: Middleton, Alan
Cc: Leighann Denton; Thelma Swem
Subject: RE: Sesko

Alan,

I need to know as soon as possible when you and Ms. Sesko are available to continue the depositions I have noted. To date I have not withdrawn the deposition notices, so they are currently still scheduled to take place on April 21.

-Mark

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Mark Koontz
Sent: Friday, April 10, 2009 12:11 PM
To: 'Middleton, Alan'
Cc: Leighann Denton; Thelma Swem
Subject: RE: Sesko

I am out of the office from April 23 to May 4. Please inquire of Ms. Sesko's availability on May 6, 7 and 11-15. Also, please ask her to be prepared to provide information regarding her personal property, real property, bank accounts, and other assets at the post-judgment deposition.

I have also attached a stip and order to allow the city to serve interrogatories on Ms. Sesko. If you agree to the stip, and if she can provide me with answers to the rogs in a reasonable time, I may not need to take her deposition in the 1997 matter. Let me know if you will sign the stip. Thanks.

-Mark

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Middleton, Alan [<mailto:AlanMiddleton@DWT.COM>]
Sent: Friday, April 10, 2009 11:29 AM
To: Mark Koontz
Subject: RE: Sesko

No -- mediation on the 17th, and I have an opening appeal brief that has to be mailed to the Idaho Supreme Court on the 23rd so I have to reserve the 22nd. After the brief is out of my hands, things open up. Again, I don't know what Ms. Sesko's availability is -- whether she's even in the country. I'd suggest we map out dates from the 27th onward for two-three weeks.

From: Mark Koontz [<mailto:Mark.Koontz@ci.bremerton.wa.us>]
Sent: Friday, April 10, 2009 11:25 AM
To: Middleton, Alan
Subject: RE: Sesko

Are you available April 17 or 22?

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.

From: Middleton, Alan [<mailto:AlanMiddleton@DWT.COM>]
Sent: Friday, April 10, 2009 10:58 AM
To: Mark Koontz
Cc: Leighann Denton; Thelma Swem
Subject: RE: Sesko

Mark, I'll check with Ms. Sesko re her availability and the photos/video. Personally, I have an immovable conflict on April 21, but could do Monday through Thursday the week following (27th through 30th).

From: Mark Koontz [mailto:Mark.Koontz@ci.bremerton.wa.us]
Sent: Friday, April 10, 2009 10:13 AM
To: Middleton, Alan
Cc: Leighann Denton; Thelma Swem
Subject: Sesko

Alan,

Attached please find two Notices of Deposition of Ms. Sesko for April 21, 2009. The first notice is for the 07-2-01698-0 case; that deposition will begin at 9:30 a.m. The second notice is for a post-judgment deposition pursuant to CR 69(b) in the 97-2-01749-3 case; that deposition will begin at 3:00 p.m. Of course, if the first deposition ends prior to 3:00 p.m., we can begin the second deposition before 3:00 at the convenience of the parties. I will deliver to you the original notices by mail.

Also, I still have not received the photos and videos that Ms. Sesko and her family took at the inspection which are responsive to the City's requests for production. Would you please provide me with copies of the photos and videos by April 15, so I may use them to prepare for the deposition? Thank you.

-Mark

Mark E. Koontz
Assistant City Attorney
City of Bremerton
345 Sixth Street, Ste. 600
Bremerton, WA 98337
360-473-2345
mark.koontz@ci.bremerton.wa.us

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

This e-mail message and its attachments may contain confidential attorney work product and be subject to the attorney-client communication privilege. It is intended solely for the use of the individual named above. If you are not the intended recipient, or the person responsible to deliver it to the intended recipient, you are hereby advised that any dissemination, distribution or copying of this communication is prohibited. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and delete and/or destroy the original and all copies of the e-mail message.